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August 26, 2016

BY ECF

Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Almazo, et al. v. Energy Resources Personnel LLC, et al.,
15-cv-4158 (JGK)

Your Honor:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiffs in the above-referenced matter. Plaintiffs write jointly with Defendants to respectfully request: (a) that discovery in this matter be extended from September 2, 2016 to November 1, 2016; and (b) the deadline to submit a Pretrial Order in this matter be correspondingly extended from October 7, 2016 to December 7, 2016. This is the parties' first request for an extension of discovery in this matter. The requested extension is necessary because the parties have made recent headway in settlement discussions, and the requested extension will potentially allow the parties to conserve significant litigation and judicial resources in this matter.

The parties thank the Court for its time and attention to this matter.

Respectfully Submitted,

_____/s/_____
Shawn Clark
Michael Faillace & Associates, P.C.
Attorneys for Plaintiffs

cc: (By ECF)
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